C-24



July 2, 2007

Mr. Howard G. Borgstrom
Director, Business Operations Center
Office of the Chief Financial Officer
U.S. Department of Energy
Mailstop CF-60, Room 4A-221
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Borgstrom-

Thank you for the opportunity to comment on the Department of Energy's proposed rulemaking on Loan Guarantees for Projects that Employ Innovative Technologies.

The American Council on Global Nuclear Competitiveness is a 501(c)(3) non-profit corporation. The Council alerts and educates Americans on the decline of the U.S. in nuclear reactor design, manufacture, and supply and of the opportunities for a restoration of U.S. global leadership in the nuclear energy industry. The Council believes a restoration of American leadership in nuclear energy can bring important benefits such as greater economic competitiveness, the creation of thousands of high-paying jobs, and increased U.S. influence in preventing nuclear weapons proliferation.

The Council believes the loan guarantee program authorized by Title XVII of the Energy Policy Act of 2005 can be an effective means of jump-starting the construction of new nuclear power plants in the U.S. The Council also believes the construction of new nuclear plants is essential to reducing air pollution and addressing concerns about greenhouse gas emissions while meeting our growing demand for electricity. We urge the Department to take heed of the comments from the Nuclear Energy Institute and others and ensure the loan guarantee program rules will provide the greatest opportunity for new nuclear power plants to be built.

Looking beyond new nuclear power plants, the Council notes that the relevant Energy Policy Act provision authorizes DOE to make loan guarantees for "advanced nuclear energy facilities." The Council believes this language allows DOE to extend the loan guarantee program rules to cover projects beyond new reactors that will restore the domestic nuclear energy design, manufacturing, service and supply industry. The regulations should be written broadly enough to encompass the range of nuclear energy facilities that will be

needed to facilitate the widespread construction and operation of new nuclear power plants in the U.S. Such projects could include:

- o Uranium mining and milling operations;
- o Uranium conversion and enrichment facilities;
- o Reactor component fabrication facilities;
- o Used fuel recycle plants; and
- o Education and training centers for plant designers, operators and craft workers

By ensuring these provisions cover other aspects of our domestic nuclear-energy infrastructure, we can start building new U.S. facilities and creating new U.S. jobs and thus restoring U.S. nuclear energy leadership.

Thank you for the opportunity to comment on the proposed rulemaking, and please do not hesitate to contact me at 301-656-1859 if you have any questions.

Sincerely,

Scott L. Campbell

President